



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
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OCT 22 2002

REPLY TO THE ATTENTION OF:

Mr. Alan Steger
Division Administrator
Federal Highway Administration
Galtier Plaza
380 Jackson Street, Suite 500
St. Paul, MN 55101-2904

B-19J

Re: **Draft Environmental Impact Statement, Highway 60 Reconstruction Project, Nobles County, MN and Osceola County, IA, EIS No. 020349**

Dear Mr. Steger:

Consistent with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (USEPA) has reviewed the referenced project document dated July, 2002.

According to the Draft Environmental Impact Statement (DEIS) submitted, the Minnesota Department of Transportation (MnDOT) in cooperation with the Iowa Department of Transportation (IDOT), proposes reconstruction Highway 60 in Nobles County, Minnesota and Osceola County, Iowa. The project limits extend from approximately 1.8 miles south of the Minnesota-Iowa border north to Interstate 90 north of the City of Worthington. The total length of the project corridor is approximately 14.3 miles. The DEIS presents seven alternatives, three base alternatives, each with a sub-alternative and the no-build alternative as follows:

Alternative A- Existing Alignment: Reconstruct four lanes on existing alignment.

Alternative A1- Existing Alignment with Bigelow Bypass: Construct four-lane easterly bypass of Bigelow, MN and reconstruct four lanes on existing alignment north of Bigelow.

Alternative B- Worthington Bypass: Reconstruct four lanes on existing alignment to Org, MN and construct four-lane westerly bypass of Worthington, MN.

Alternative B1- Worthington Bypass with Bigelow Bypass: Construct four-lane easterly bypass of Bigelow, MN, reconstruct four lanes on existing alignment to Org, MN, and construct four-lane westerly bypass of Worthington, MN.

Alternative C- Two lane Worthington split: Reconstruct four lanes on existing alignment to Org, MN, construct two-lane westerly bypass of Worthington, MN and reconstruct two lanes on

existing alignment through Worthington, MN.

Alternative C1- Two lane Worthington split with Bigelow bypass: Construct four lane easterly bypass of Bigelow, MN, reconstruct four lanes on existing alignment to Org, MN, construct two lane westerly bypass of Worthington, MN, and reconstruct two lanes on existing alignment through Worthington, MN.

Alternative D- No Build:- Two lanes on existing alignment with minor reconstruction including general maintenance, turn lane improvements, shoulder widening, and spot safety improvements.

We conducted a review of the DEIS and offer comments in the following areas: purpose and need, water quality impacts, natural resource impacts, and historic and cultural resources. Since the DEIS did not identify a preferred alternative, our Agency has assigned a separate rating to each alternative listed in the DEIS. Based on our review of each alternative contained in the DEIS for its adequacy of information and potential environmental impacts, **U.S. EPA has assigned each separate build alternative a rating of EC-2 (Environmental Concerns - Insufficient Information).** This means our review has identified environmental impacts that should be avoided in order to fully protect the environment. **We rate the “No Build” alternative as “Lack of Objections” (LO).** Furthermore, as detailed in this letter, U.S. EPA believes that additional information, data, analyses and discussion should be included in the Final Environmental Impact Statement (FEIS). Therefore, **we have assigned to the DEIS a rating of EC-2, based on our review and rating of the individual alternatives.**

Purpose and Need: The purpose and need for the subject project is not adequately identified nor supported in the DEIS. As a specific example, according to the DEIS, the focus of the project's purpose and need is to enhance system continuity along Highway 60, which is defined in the DEIS as the compatibility of level of service (LOS), traffic flow, and/or roadway design. However, there is a minimal difference in the LOS reported in table 3 (p.38) between the existing Highway 60 configuration in the year 1998 and the “No Build” alternative (alternative D) for the future year 2030. According to the DEIS, the “No Build” alternative in the year 2030 would provide an acceptable LOS C for all roadway segments or intersections in rural locations in Minnesota. There are also no specifics regarding roadway deficiencies along Highway 60. Finally, the DEIS does not indicate how each of the alternatives would individually, or relative to one another, serve to fulfill any stated project purpose and need. Based on the information presented in the DEIS and the Traffic Report for TH 60 EIS (SEH No. A-MNDOT0105.00) **we believe the “No Build” alternative, including traffic signal improvements outlined in the traffic report, is a viable option to maintain an acceptable LOS.**

Water Quality Impacts:

Wetlands: According to the DEIS, all of the proposed build alternatives will impact wetlands in the project area. Table 22 (p. 117) indicates that total wetland acreage impacts under the build alternatives range from a minimum of 30.4 acres under Alternative B to a maximum of 39.5 acres under Alternative C1. The U.S. EPA considers wetlands to be an important environmental resource and recommends that the project sponsor coordinate with the U.S. Army

Corps of Engineers (Corps) to determine the jurisdictional status of wetlands in the project area and to begin coordination on any necessary mitigation strategies which should be included in the Final Environmental Impact Study (FEIS). We also recommend that the sponsor include a detailed wetland delineation in the FEIS for the Preferred Alternative.

Surface Water Quality: According to the DEIS, each of the proposed alternatives may affect some portion of the drainage system. Several new culverts and drainage ditches would need to be constructed for the Bigelow and Worthington bypasses. Also, nearly all of the existing culverts would need some type of extension or replacement to accommodate wider roadways and many of the existing culverts would need to be replaced to handle increased capacity. The U.S. EPA recommends that specific information be included in the FEIS which indicates the required flow capacity required to meet local drainage requirements based on the calculated increase in impervious surface area. If shown to be necessary, the size, design and siting locations should be included in the FEIS for any necessary storm water detention ponds or other mitigation strategies such as vegetated drainage swales.

Natural Resource Impacts:

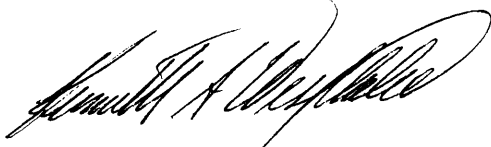
Prime and Unique Farmland: According to the Farmland Special Study, dated July 2002 prepared as part of the Highway 60 Draft EIS, "...approximately 96 to 99 percent of the farmland in the study area is classified as prime farmland." According to the study, prime farmland acreage losses range from a minimum of 143 acres for Alternative A, to a maximum of 320 acres for Alternative B1. The EPA recommends that Natural Resources Conservation Service (NRCS) Form AD-1006, "Farmland Conversion Impact Rating" be completed for property in Minnesota which will be impacted under each alternative. The total points assigned under each alternative's rating can help determine the relative level of impacts among alternatives.

Land Use Planning: According to the Social, Economic, and Land Use Special Study, dated July 2002 prepared as part of the Highway 60 Draft EIS, "...the decrease in agriculturally productive land under all build alternatives and the potential for induced development associated with the Worthington bypass are inconsistent with the Nobles County Community Based Plan's land use goals." U.S. EPA believes land use planning is important when considering the use of bypasses in some of the alternatives, since it may provide avenues for secondary growth along the corridor. As such, the EPA would like to see coordination with the planning offices of Nobles County and Washington City to assure that consistency and/or compliance with city or county land use plans is a criteria in the decision making process to determine a preferred alternative.

Historic and Cultural Resources: According to the DEIS, none of the build alternatives are anticipated to impact historic architectural or archeological properties. The DEIS also states that the Iowa State Historic Preservation Office (SHPO) has concurred with these findings but concurrence by the Minnesota SHPO is currently pending. The U.S. EPA encourages the project sponsor to complete the coordination process with the Minnesota SHPO and, if necessary, complete the consultation process with the Minnesota SHPO if it is determined that any affected properties or sites are in the project area for the preferred alternative.

We appreciate the opportunity to review the Draft Environmental Impact Statement for the Highway 60 Reconstruction Project. Any questions regarding this letter can be directed to Mr. Don Kathan of my staff, at (312) 886-0448. You may also contact him at kathan.donald@epa.gov.

Sincerely,



Kenneth A. Westlake
Chief, Environmental Planning and Evaluation Branch
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cc:

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